



Jaclyn DeMais
Tel 973.360.7900
Fax 973.301.8410
demaisj@gtlaw.com

April 8, 2024

VIA E-FILING

Judge Michael A. Hammer
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, N.J. 07101

**Re: *Arbour v. Tingo Group, Inc. et al.*, Case No: 2:23-cv-03151-ES-MAH
Bloedorn V. Tingo Group Inc. et al., Case No.: 2:23-CV-03153-ES-MAH**

Dear Judge Michael A. Hammer:

Per Your Honor's March 22, 2024 Text Order (ECF No. 59 in the *Arbour* action), please be advised that Greenberg Traurig, LLP intends to withdraw as defense counsel due to non-payment, and we propose a deadline of April 19, 2024, to submit a formal motion to withdraw.

In light of, among other things, the complaint filed by the SEC against the Company and others on December 18, 2023, which raises issues concerning the authenticity of Tingo Mobile and Tingo Foods financial documents, we cannot comment on the Company's financial viability.

Respectfully,

A handwritten signature in black ink that reads "Jaclyn DeMais".
Jaclyn DeMais

JD:ib
cc: All Counsel of Record

Greenberg Traurig, LLP | Attorneys at Law

500 Campus Drive | Suite 400 | Florham Park, New Jersey 07932 | T +1 973.360.7900 | F +1 973.301.8410

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